

2920-04

Satralloy (PRP) Correspondance



ATRALLOY INC.

MEMBER OF THE SATRA GROUP

EPA Region 5 Records Ctr.



383942

November 24, 1982

Mr. Karl J. Klepitsch, Jr.
Chief, Waste Management Branch
United States Environmental
Protection Agency, Region V
111 West Jackson Boulevard
P.O. Box A3587
Chicago, Illinois 60690-4587

RE: Satralloy, Inc.: Part A Application
-Non-Hazardous Waste

Dear Mr. Klepitsch:

I am writing in response to your letter of September 29, 1982 asking for clarification of Satralloy's Part A Application.

Satralloy produces ferroalloys by smelting and refining of basic ores and minerals. The wastes identified in Satralloy's Part A Application are ferroalloy slag or pollution control dusts and sludges which have been exempted from regulation under the federal Resource Conservation and Recovery Act and the applicable federal and state hazardous waste rules. 42 USC 6982 (p); 46 Fed. Reg. 4614 (January 16, 1981); OAC 3745-51-04 (B)(7). Therefore, you are correct that no hazardous waste permit is needed for Satralloy's facility.

You asked that Satralloy withdraw its Part A Application if it does not need a hazardous waste facility permit at this time. Please consider this letter Satralloy's formal withdrawal of its application. I understand that if Satralloy's waste does become subject to regulation under the federal hazardous waste rules it can gain interim status for its facility by filing a new Part A application. 40 CFR 122.22(a)(1); 45 Fed. Reg. 76633 (November 19, 1980).

Very truly yours,

Greg Oztemel
Vice President

cc: Ohio EPA, Southeast District Office
Ohio Hazardous Waste Facility Approval Board



SATRALLOY INC.
MEMBER OF THE SATRA GROUP

*Re: Jefferson Co.
Gen. Corr. Co.*

O.E.P.A.
S.E.D.O.

KD - E/I

1986 DEC 31 AM 11:16

BA

December 29, 1986

Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, Ohio 43138

RE: OEPA Permit No. OI000037
Form 2C

Dear Sir:

Satralloy, Inc. originally submitted Form 1 on June 16, 1983 with its permit renewal and re-submitted Form 1 on November 11, 1986 to your Columbus, Ohio office. However, at neither time did we submit Form 2C due to the operating status of the Plant.

Presently, the plant is operating a concentrator recovering ferrochromium from our slag dumps. The manufacturing facility has permanently ceased operations. Accordingly, we are submitting Form 2C to be incorporated with Form 1.

Thank you for your understanding and patience in this matter.

Sincerely,

L. A. DiPaolo
Louis A. DiPaolo
Plant Manager/Controller

Enclosures

cc: Ohio EPA, 361 E. Broad Street, Columbus, Ohio
J. Reidy



SATRA CONCENTRATES, INC.

~~XXXXXXXXXXXXXX~~

MEMBER OF THE SATRA GROUP

August 2, 1989

Mr. Michael Moschell, Inspector
 Division of Solid and Hazardous Waste Management
 Ohio Environmental Protection Agency
 2195 Front Street
 Logan, Ohio 43138-9031

RE: Your Letter of June 19, 1989; Jefferson County
 Satralloy/Satra Concentrates, RCRA Correspondence File

Dear Mr. Moschell:

Thank you again for allowing us additional time to respond to your letter of June 19, 1989.

Your letter cites a number of regulations concerning hazardous wastes that have, in your estimation, been violated in the course of present operations. Your letter raises a number of issues. The purpose of this letter is not to discuss each such issue but, rather, to focus on the basis of your letter. In our view, your appraisal of the situation is based upon your statement that "K091 is presently listed as a hazardous waste," your unstated assumption that any such listing is effective in Ohio, and the application of any such listing to this facility's materials.

This is not the case. First, no regulation listing K090 and K091 affects any facility in Ohio. Secondly, even if the regulations were amended to affect facilities in Ohio, no such regulation will affect the materials at Satralloy's and Satra Concentrates' facilities in Jefferson County. Permit me to elaborate.

First, as to the point that no regulation that lists K090 and K091 affects any facility in Ohio, your letter refers to the federal listing of K090 and K091 in September, 1988. The Federal Register notice on the listing specifically stated that the listing was being made pursuant to the authorities granted U.S. EPA by the Resource Conservation and Recovery Act (RCRA) and not the Hazardous and Solid Waste Amendments of 1984 (HSWA). 53 Fed. Reg. 35412, 35417, col. 2 (Sept. 13, 1988). The effect of this is, as the notice states, that the "final listings are not effective in authorized States..." Id.

As you are aware, the State of Ohio has received final authorization to "operate its program in lieu of the Federal Program" for hazardous waste management. 54 Fed. Reg. 27170 (June 28, 1989). See also 40 CFR 271.3 (b) (1988). The June 28, 1989, regulation amends Subpart KK of 40 CFR Part 272 and lists all of the Ohio regulations that are incorporated by reference and codified as part of the RCRA program. None of the Ohio regulations so enumerated lists K090 and K091 as hazardous waste. Indeed, under Ohio law, the equivalent of the Bevill Amendment exemption, remains in effect. OAC Rule

Mr. Michael Moschell
August 2, 1989
Page 2


3745-51-04(B)(7). Thus, in Ohio K090 and K091 are not listed as hazardous wastes and, indeed, are exempt from regulation as hazardous wastes.

The second point is that, even if the Ohio regulations were amended to eliminate the exemption or to list K090 and K091 as hazardous wastes, such a regulation would not apply to any materials at Satralloy's and Satra Concentrates' facilities. The listing of a material as a hazardous waste affects only newly-generated materials. In any event, the listing does not affect materials that were deposited, as these were, more than six years prior to the listing. This has been the consistent interpretation by U.S. EPA of RCRA. See e.g., 54 Fed. Reg. 15316, 15338 (Apr. 17, 1989).

Finally, your letter requested an evaluation of certain materials to determine whether or not they are hazardous wastes. I am presently evaluating the materials in drums and will convey the results to you when I have received them.

Should you have any questions concerning the issues raised by this letter, please do not hesitate to contact me. We look forward to working with you toward an amicable resolution of your letter of June 19, 1989.

Sincerely,


Louis A. DiPaolo

cc: J. Thunder, SS&D



SATRA CONCENTRATES, INC.

~~SATRA CONCENTRATES, INC.~~

MEMBER OF THE SATRA GROUP

1989 SEP 25 AM 9:05

September 21, 1989

Mr. Ryszard Lecznar
Group Leader, Enforcement & Compliance
Ohio EPA
2195 Front Street
Logan, Ohio 43138-9031

RE: Your Letter of July 5, 1989
Jefferson County, Satralloy

Dear Mr. Lecznar:

This letter is a follow-up of my letter to you dated, August 2, 1989. Of course, nothing in this letter admits to any violation of any law. We are taking this opportunity to provide you with the latest happenings regarding Point No. 1 in your letter of July 5th - EXCESS WATER FROM BULLJIG OPERATION.

We have thoroughly investigated this situation and along with the assistance of an outside engineer we have developed the following plan to correct this problem.

In order to have recirculation of the water used in the Bulljig Operation we are going to install pumping equipment in our discharge pond. This equipment will be used to pump water to our feed chute; replacing the fresh water that is now suppling the chute. Thus, eliminating the loss of our process wastewater.

We plan to have this equipment install within the next few weeks and if you have any questions, please advise.

Sincerely,

Louis A. DiPaolo

cc: J. Thunder
H. Mott
T. Winterhalter



SATRA CONCENTRATES, INC.

~~SATRA CONCENTRATES, INC.~~

MEMBER OF THE SATRA GROUP

APR 12 PM 12:01

April 11, 1991

VIA FEDERAL EXPRESS

Mr. John Owen
 OEPA - Division of Water Pollution Control
 Permit Section
 P.O. Box 1049, 1800 Watermark Drive
 Columbus, Ohio 43266-0149

RE: OEPA Permit No.: OID00037*CD
 Application No.: OH0041190
 Facility: Satra Concentrates, Inc.

Dear Mr. Owen:

I would like to express my sincere appreciation for you, Mr. Morrison, and Mr. Novak meeting with me on April 9, 1991; thereby, allowing me the opportunity to discuss my concerns with the above-described document.

I derived from the meeting that OEPA recognized my concerns and will respond directly by letter. In order to review their response properly, I am requesting an extension of the Public Notice Comment Period which ends on Friday, April 26, 1991. I am requesting that the comment period be extended, on my behalf, for two weeks/fourteen days from the date of OEPA's response.

The following is my understanding of our discussions regarding the concerns I noted in my letter, dated March 28, 1991.

- 1) Proposed monitoring for Barium, Chromium and Aluminum
 ---OEPA Central Office will review the necessity for this provision.
- 2) Proposal to eliminate the process wastewater at Outfall 004 ---Satra Concentrates, Inc.(SCI) will be required to execute a program that would curtail process wastewater from entering into Cross Creek. PROGRAM: Construct a large settling pond to control the discharged water from the Bull Jig and place into service a water recycling system. OEPA will set a twelve month compliance period.

Twelve Month Period Breakdown: (After Final Action)

- a) SCI to submit a PTI describing the program for restricting process wastewater from entering into Cross Creek. (3 Months)
- b) Period for OEPA approval. (2 Months)
- c) SCI compliance period. (6 Months)

Page Two of Two

Satra Concentrates, Inc.
OEPA Permit No.: OID00037*CD

- 3) Proposal to monitor Outfall 004 even after the elimination of process wastewater ---OEPA will require 12 samples (monthly ~~or~~ semi-monthly) to determine if monitoring shall continue.
- 4) Proposal to monitor for Oil and Grease at Outfall 004 ---Will be included in parameters and reviewed per item three.
- 5) Proposal to include elaborate BMP provision ---OEPA will accept a limited plan basically outlining SCI's areas of potential hazard and what precautionary measures will be taken to eliminate or control.
- 6) Proposal to eliminate sanitary discharge at Outfall 001 ---Will be further reviewed by OEPA Central Office and District personnel.

I stated that it is my contention, because of the minumum use of SCI's present system and the consistent anlytical results under the regulatory limits the need for a replacement system is unnecessary.

The following options were discussed:

- a) Implementation of a septic system - This could be costly and unwarranted due the short life of the operation.
 - b) Renovate and bring the existing treatment plant up to standard - Not only is this impractical; but, even if it were, the testing results would be the same as the present results.
- 7&8) Relationship between the deadline to eliminate sanitary discharge and process wastewater and any delay by OEPA in reviewing a required PTI ---Will follow the Twelve month compliance schedule as outlined in item two.

I am hopeful that final action of this proposed NPDES permit will be suitable to SCI's operation and have the required regulatory limits to meet OEPA satisfaction.

The main point that I would like to re-emphasize is that SCI is a very small operation. With regard to sanitation treatment, the maximum number of people utilizing the facility is ten. As the operation begins to be phase-out this number will be reduced sharply. Realistically, at present the system is probably only being used by less than five people; hardly enough to justify any costly expenditure.

I await your comments and results from our meeting.

Sincerely,
L. A. DiPaolo
Louis A. DiPaolo

cc: P. Novak, J. Morrison,
S. Alspach & R. Lecznar



SATRA CONCENTRATES, INC.

~~XXXXXXXXXXXX~~

MEMBER OF THE SATRA GROUP

MARCH 28, 1991

RECEIVED

Mr. John Owen
 OEPA-DIVISION OF WATER POLLUTION CONTROL
 PERMIT SECTION
 P.O. BOX 1049, 1800 WATERMARK DRIVE
 COLUMBUS, OHIO 43266-0149

APR 01 1991**DWPC-Water Program**

RE: OEPA Permit No. : 01D00037*CD
 Application No. : OH0041190
 Facility: Satra Concentrates, Inc.
 Public Notice No.: OEPA-91-03-136, March 28, 1991

Dear Mr. Owen:

As I indicated in our telephone conversation today, I am interested in having an opportunity to meet with you to discuss my concern with the above-described document prior to the close of the public comment period. You have suggested that I describe these concerns in writing in anticipation of our meeting. I am happy to oblige.

As you are aware, since this is a minor permit, there was no fact sheet accompanying the public notice. Thus, there is no description of the bases for including the terms and conditions in the Draft Permit.

I would like to inquire about the bases for including several of the terms and conditions. These include:

- the proposal to monitor for Barium, Total and Hexavalent Chromium, and Aluminum, and to do so for the life of the permit;
- the proposal to eliminate the process wastewater at Outfall 004 as immediate (see page 6 of 20) or as subject to a six-month phase-in (see page 3 of 20);
- the proposal to monitor Outfall 004 even after the elimination of process wastewater;
- the proposal to monitor for Oil and Grease at Outfall 004;
- the proposal to include elaborate BMP provisions for an extremely small company that does not handle the materials

State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

TELECOPIER COVER LETTER

Please Deliver The Following Telecopied Page(s) To:

NAME: Steve Alspach / Bruce Golt DWPC DATE: 4/1/91

COMPANY: South East District Office

FACSIMILE NO.: _____

NUMBER OF PAGES INCLUDING COVER LETTER: 3

SENDER: John Owen DWPC CO.

If you do not receive all of the pages and/or any problems arise during transmission, please call ASAP at (614) 644-3020 to speak with the facsimile operator.

Our facsimile number is (614) 644-2329.

NOTE:

Satra Concentrates, Inc.
OEPA Permit No.: 01D00037*CD

--the relationship between the 6-month deadline to eliminate the sanitary discharge and any delay by OEPA in reviewing a PTI required on Page 9; and

--similarly, the relationship between the deadline to eliminate the process wastewater and any delay by OEPA in reviewing a PTI required on Page 9.

Our meeting will help me understand the reasons for these proposals. I will call you next week to schedule a mutually acceptable time for our meeting.

Best regards,

L. A. DiPaolo

Louis A. DiPaolo
Manager



~~AMERICAN WATER WORKS ASSOCIATION~~
MEMBER OF THE SATRA GROUP

April 12, 1990

Mr. Steve Alspach
District Representative
Ohio EPA, Southeast District Office
2195 Front Street
Logan, Ohio 43318

RE: PRE-PERMIT INSPECTION, NPDES OID00037

Dear Mr. Alspach:

I have received your letter dated, March 13, 1990 and I again apologize for the lateness of my response. As I mentioned to you by telephone I was out of town when your letter arrived and upon my return on March 26th the allotted time to respond had elapsed. I thank you again for extending the response time to April 15th.

Your letter addressed two problem areas that were found at the time of your inspection on January 17, 1990.

- 1) Bulljig Unit Sedimentation/Recirculation: In response to your observation of wastewater overflowing into an open drainage channel and discharging into Cross Creek, I would like to refer to my letter (copy enclosed) to the Environmental Board of Review requesting the permit be amended in accordance with Satra Concentrates operations. Notably, the dischargement of the Bulljig wastewater passes through Sampling Station D037002. Presently, this station is being reported as inactive because it was setup to monitor Cooling Tower Blowdown and this unit hasn't operated since Satralloy curtailed its manufacturing operations. Thus, even if all wastewater cannot be stopped from entering the drainage channel; this monitoring station could be used to determine that the wastewater merging with runoff water is within regulatory guidelines.
- 2) Sanitary Wastewater Treatment Plant: You outlined this matter from the standpoint that; (a) The plant was not being operated properly, (b) The plant was in need of extensive repairs and (c) The suggestion of installing a septic tank system.

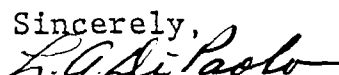
The effluent sampling from our Sanitary Treatment Plant has consistently met the discharge limitations as set forth in our permit. I agree that the treatment plant is not in the best working condition; however, Satra Concentrates is not operating at the level the NPDES permit authorized Satralloy to discharge from the Wastewater Treatment Plant.

Therefore, a revised permit should be issued to Satra Concentrates, Inc. that would be more suitable to the Plant's present operating status.

Generally, I would suggest that three monitoring stations be established, they being:

- 1) Sewage Treatment Plant - Sampling, Effluent Limitations and Monitoring requirements be based on the present operating status.
- 2) South Storm Sewer - Sampling, Effluent Limitations and Monitoring requirements that would regulate the addition of Bulljig wastewater entering the diversion ditch and merging with runoff water prior to entering Cross Creek.
- 3) North Storm Sewer - Runoff source, with sampling taken at end of Storm Sewer prior to entering Cross Creek.

I hope that these suggestions will be seriously considered; in view, that Satra Concentrates, Inc. operation has a possible limited duration of less than two years.

Sincerely,

Louis A. DiPaolo
Plant Manager

Enclosure